



**GENOVA
BURNS**
ATTORNEYS-AT-LAW

Genova Burns LLC
494 Broad Street, Newark, NJ 07102
Tel: 973.533.0777 **Fax:** 973.533.1112
Web: www.genovaburns.com

Rajiv D. Parikh, Esq.
Counsel
Member of NJ and NY Bars
rparikh@genovaburns.com
Direct: 973-535-4446

April 22, 2015

VIA ECF AND UPS OVERNIGHT MAIL

Honorable Mark Falk, U.S.M.J.
United States District Court
District of New Jersey
Frank R. Lautenberg U.S. P.O. & Courthouse
1 Federal Square
Newark, New Jersey 07101

Re: Jagdish Patel and Kishan Patel v. Jignesh Pandya, et al.
Civil Action No.: 14-8127 (WJM) (MF)

Dear Judge Falk:

We write jointly on behalf of all parties, and pursuant to the directives of Judge Martini's law clerk, to inform Your Honor of recent developments in this case and to formally request the scheduling of a Rule 16 conference. By way of background, on February 11, 2015, defendants filed a motion to dismiss pursuant to Rule 12(b)(2) (lack of personal jurisdiction) and Rule 12(b)(6) (failure to state a claim). After plaintiffs filed an opposition to the motion to dismiss, and upon discovery of new information, counsel for both parties conferred and defendants withdrew all of their jurisdictional objections.

On April 9, 2015, counsel for both parties informed Judge Martini's chambers that defendants' Rule 12(b)(2) arguments had been withdrawn. During that telephone conference, Judge Martini's law clerk, advised that in light of the fact that defendants are only seeking partial dismissal of the complaint, discovery should proceed in this matter. Accordingly, he advised the parties to request a Rule 16 conference in order to facilitate same.

Pursuant to these instructions, we jointly request the scheduling of a Rule 16 conference so that the parties may engage in discovery as soon as possible given the serious nature of this dispute.



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Thank you for Your Honor's attention to this matter.

Respectfully Submitted,

GENOVA BURNS LLC

A handwritten signature in blue ink, reading "Rajiv D. Parikh". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

RAJIV D. PARIKH

RDP:cp

c: Justin A. Jacobs, Esq. (via ECF)
Courtney Dolaway Zeuner, Esq. (via ECF)